



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101
FEB - 8 1980

Tulip
(Concurrence copy)

Reply To
Attn Of: OAQ-107

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Norman Mahoney
Registered Agent for
Cominco Alaska, Inc.
717 K Street
Anchorage, Alaska 99501

Re: Administrative Order
Cominco Alaska, Inc. - Red Dog Mine Facility

Dear Mr. Mahoney:

The enclosed Administrative Order is issued pursuant to Sections 113(a)(5) and 167 of the Clean Air Act (CAA or Act), 42 U.S.C. §§ 7413(a)(5) and 7477 and requires Cominco Alaska, Inc. (Cominco) to comply with the terms specified in it.

Section 113(a)(5) of the Act, 42 U.S.C. § 7413(a)(5) provides in part:

Whenever, on the basis of any available information, the Administrator finds that a State is not acting in compliance with any requirement or prohibition of the [Act] relating to the construction of new sources or the modification of existing sources, the Administrator may -

- (A) issue an order prohibiting the construction or modification of any major stationary source in any area to which such requirement applies;
- (B) issue an administrative penalty order in accordance with subsection (d) of this section; or
- (C) bring a civil action under subsection (b) of this section.

Section 167 of the Act, 42 U.S.C. § 7477, provides in part:

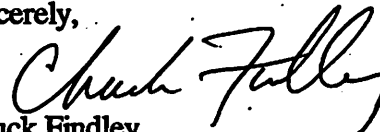
The Administrator shall, and a State may, take such measures, including issuance of an order, or seeking injunctive relief, as necessary to prevent the construction or modification of a major emitting facility which does not conform to the requirements of this part, or which is proposed to be constructed in any area designated pursuant to section 7407(d) of this title as attainment or unclassifiable

and which is not subject to an implementation plan which meets the requirements of this part.

The Alaska Department of Environmental Conservation (ADEC) Permit No. 9932-AC005 issued to Cominco on or about December 10, 1999, which allowed Cominco to commence construction of the Wartsila diesel generator MG-17 at the Red Dog mine facility fails to comply with Part C of the Act, 42 U.S.C. § 7470-7491, as well as the federal implementing regulations and the Alaska State Implementation Plan. Additionally, the permit was issued in violation of the Order issued to ADEC on December 10, 1999. EPA has issued a Finding of Noncompliance and Violation to ADEC under Section 113(a)(5) of the Act, finding that the State of Alaska failed to comply with Part C of the Act, 42 U.S.C. § 7470-7492, as well as the Federal and State implementing regulations when it issued this permit. Since this permit is invalid as it applies to MG-17, any construction of MG-17 pursuant to ADEC Permit No. 9932-AC005 is not authorized under the Act. The enclosed Administrative Order to Cominco prohibits the construction of MG-17 prior to demonstrating compliance with Part C of the Act, 42 U.S.C. § 7470-7492, and obtaining a valid permit from ADEC for MG-17.

You have the opportunity to confer with EPA concerning this Order. If you wish to request a conference, to occur no later than March 16, 2000, please call Mr. Hardesty, Chief, Federal and Delegated Air Programs Unit, (206) 553-6641, within 10 days of the date of this letter.

Sincerely,



Chuck Findley
Deputy Regional Administrator

Enclosure

CC: John Key, General Manager, Cominco
Larry Hartig, counsel for Cominco
Michele Brown, ADEC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:)	
Cominco Alaska, Inc.,)	Docket No. CAA-10-2000-0035
)	ADMINISTRATIVE ORDER
Proceeding under Sections 113(a)(5))	
and 167 of the Clean Air Act.)	(42 U.S.C. §§ 7413(a)(5) and 7477)
)	

I. ADMINISTRATIVE ORDER

1. This Administrative Order is issued by the Regional Administrator, Region 10, United States Environmental Protection Agency (EPA), to Cominco Alaska, Inc., (Cominco) pursuant to Sections 113(a)(5) and 167 of the Clean Air Act (CAA or Act), 42 U.S.C. §§ 7413(a)(5) and 7477.

2. The authority of the Administrator of EPA to issue orders pursuant to Sections 113(a)(5) and 167 of the Act, 42 U.S.C. §§ 7413(a)(5) and 7477, has been delegated to the Regional Administrator. The Regional Administrator consulted with the Assistant Administrator for the Office of Enforcement and Compliance Assurance or his designee pursuant to the delegation of authority from the Administrator prior to issuing this Administrative Order.

II. STATUTORY AND REGULATORY AUTHORITY

3. The Administrator of EPA, pursuant to Section 109 of the Act, 42 U.S.C. § 7409, promulgated National Primary and Secondary Ambient Air Quality Standards (NAAQS) for certain criteria pollutants, including nitrogen dioxide (NO₂). 40 C.F.R. §§ 50.4 to 50.12.

4. Pursuant to Section 107(d) of the Act, 42 U.S.C. § 7407(d), the Administrator

promulgates lists of attainment status designations for each air quality control region (AQCR) in every State. These lists contain the attainment status of each AQCR for each of the criteria pollutants. The attainment status designations for the Alaska AQCRs appear at 40 C.F.R. § 81.302.

5. Cominco Alaska, Inc. (Cominco) owns and operates the Red Dog mine facility, a surface zinc and lead ore mining operation, which is located in the Northern Alaska Interstate AQCR which has been designated as in attainment or unclassifiable with respect to the NAAQS. 40 C.F.R. § 81.302.

6. Part C of the Act, 42 U.S.C. §§ 7470-7492, requires the Administrator to promulgate regulations for prevention of significant deterioration (PSD) of air quality in areas designated in accordance with Section 107(d) of the Act, 42 U.S.C. § 7407(d), as in attainment or unclassifiable.

7. Pursuant to Sections 110 and 165(e)(3) of the Act, 42 U.S.C. §§ 7410 and 7471(e)(3), EPA promulgated two sets of largely identical regulations for preventing the significant deterioration of air quality in areas where the existing air quality is better than the ambient standards. In States without a PSD program and in those States where EPA has delegated authority to administer the federal PSD program to the State, the federal PSD regulations at 40 C.F.R. § 51.21 have been incorporated into the various State Implementation Plans (SIPs) of such States. In the remaining States, EPA has approved, as part of the SIP, a State PSD program as meeting the requirements of Part C of the Act and the PSD regulations at 40 C.F.R. § 51.166.

8. EPA has approved 18 AAC 50.020, 50.021, 50.300, 50.400, 50.510, 50.520, 50.530, 50.600, 50.620, and 50.900, as in effect on June 2, 1988, as a revision to the Alaska SIP and as meeting the requirements of Part C of the Act and the PSD regulations at 40 C.F.R. § 51.166 for preventing the significant deterioration of air quality. See 40 C.F.R. § 52.96(a). (48 Fed. Reg. 30626, July 5, 1983, and subsequent amendments.) References in this document to Alaska statutory or regulatory provisions are to the current SIP-approved versions of the statute or regulation.

9. Section 165 of the Act, 42 U.S.C. § 7475, prohibits the construction of a major emitting facility in any area subject to the requirements of Part C of the Act and the PSD regulations unless, among other things, a permit has been issued for the proposed facility in accordance with Part C of the Act which sets forth emission limitations that conform to the requirements of Part C, and the proposed facility is subject to best available control technology (BACT) for each pollutant subject to regulation under Title I of the Act that is emitted from or which results from such facility.

10. "Actual emissions" as defined in 18 AAC 50.900(1)(1991) means "for each air contaminant, the average rate in tons per year that a facility actually emitted during the most recent two years of normal operation; the department will, in its discretion, consider facility-specific allowable emissions to be actual emissions of an air contaminant."

11. "Construct" as defined in 18 AAC 50.900(13)(1991) means "to make a change or a series of changes in operation or any physical changes or additions to a source which increase the actual emissions of an air pollutant."

12. "Allowable emissions" as defined in 18 AAC 50.900(4)(1991) means "the calculated emission rate of a source or facility using the maximum rated capacity and enforceable limitations and conditions on emissions and operations."

13. "Modify" as defined in 18 AAC 50.900 (28)(1991) means "to make a change or a series of changes in operation or any physical changes or additions to a source which increase the actual emissions of an air pollutant."

14. "Best available control technology" is defined in 18 AAC 50.900(9)(1991) as an emission limitation which represents the maximum reduction achievable for each regulated air pollutant taking into account energy, environmental, and economic impacts, and other costs.

15. 18 AAC 50.300(a)(1991) states that no person may construct, modify, reconstruct, operate, or cause the operation of a facility meeting the criteria in that subsection without a permit from the State of Alaska, Department of Environmental Conservation (ADEC). The list of facilities covered by 18 AAC 50.300(a) includes a facility which has allowable emissions of more than 250 tons per year of a regulated air contaminant and which is modified after August 7, 1980, or after the date of the most recent permit issued to the facility under 18 AAC 50.400(c)(3), causing an increase in actual emissions equal to or exceeding any of the thresholds identified in that subsection.

16. A permit application for a facility subject to 18 AAC 50.300(a)(5) or (6) must include, among other things, a detailed demonstration that the expected maximum emissions from the facility will not cause or contribute to a violation of an ambient air standard or allowable increment in 18 AAC 50.020(b).

17. 18 AAC 50.400(c)(3)(A)(1991) states that ADEC will issue a permit only if the applicant shows that, for a facility subject to 18 AAC 50.300(a)(5) or (6), BACT for controlling emissions of each regulated pollutant will be installed for each new or modified source.

18. Section 113(a)(5) of the Act, 42 U.S.C. § 7413(a)(5) provides:

Whenever, on the basis of any available information, the Administrator finds that a State is not acting in compliance with any requirement or prohibition of the [Act] relating to the construction of new sources or the modification of existing sources, the Administrator may -

(A) issue an order prohibiting the construction or modification of any major stationary source in any area to which such requirement applies;

(B) issue an administrative penalty order in accordance with subsection (d) of this section; or

(C) bring a civil action under subsection (b) of this section.

Nothing in this subsection shall preclude the United States from commencing a criminal action under subsection (c) of this section at any time for any such violation.

19. Section 167 of the Act, 42 U.S.C. § 7477, provides that the Administrator shall take such measures, including issuance of an order, as necessary to prevent the construction or modification of a major emitting facility which does not conform to the requirements of Part C of the Act.

20. Section 169(1) of the Act, 42 U.S.C. § 7479(1), defines a major emitting facility, in pertinent part, as a stationary source which emits or has the potential to emit 250 tons per year or more of any air pollutant.

21. A State does not conform to the requirements of Part C of the Act if, among other things, it allows a major emitting facility to commence construction or modification prior to receipt of a PSD permit or issues a PSD permit to a facility without subjecting the facility to

BACT for each pollutant subject to regulation under Title I of the Act that is emitted from or which results from such facility.

22. A major emitting facility does not conform to the requirements of Part C if, among other things, it commences construction or modification prior to receipt of a PSD permit that subjects the facility to BACT for each pollutant subject to regulation under Title I of the Act that is emitted from or which results from such facility.

III. FINDINGS OF FACT

23. On June 17, 1988, ADEC issued a PSD permit, Permit No. 8732-AA001, that authorized the construction of the Red Dog mine facility, including the installation of five Wartsila diesel generators (MG-1, MG-2, MG-3, MG-4, and MG-5).

24. ADEC revised and replaced the June 1988 PSD permit on several occasions, including a revision dated July 27, 1994, Permit No. 9332-AA003, which: (a) removed from the permit a NO_x BACT limit of 750 parts per million volume dried (ppmvd) that applied to the five Wartsila diesel generators, and substituted a limit of 109,660,000 kilowatt hours per continuous 365-day period (kW-hr/yr) for MG-1, MG-3, MG-4, and MG-5, (b) removed the stand-by limits on MG-2 and permitted it to operate full-time, and (c) authorized the installation and full-time operation of a sixth Wartsila diesel generator (MG-6).

25. On March 27, 1996, prior to receiving an amended PSD permit, Cominco requested that ADEC allow Cominco to make on-site preparations for changes to the facility that would allow for production increases. On April 2, 1996, ADEC granted Cominco a waiver to allow the company to conduct specified procurement and construction activities on the condition

that Cominco prepare and submit a request for a permit amendment concurrent with the activities.

26. Between April 1996 and May 1998, Cominco constructed a new gyratory crusher at the Red Dog mine facility without authorization under a valid PSD permit.

27. On June 29, 1998, Cominco submitted a PSD permit application to ADEC for what it referred to as a "production rate increase project" that was expected to increase the mine's ore processing rate from approximately 2,200,000 tons per year to 3,500,000 tons per year and to increase the production of zinc and lead concentrate from 854,000 tons per year to 1,400,000 tons per year. Cominco submitted a supplement to the application to ADEC on April 6, 1999. As part of the production rate increase project, Cominco requested that ADEC, among other things, remove the air quality operating restrictions on the four Wartsila diesel generators that were installed in 1988 and which still had operational limits on them (MG-1, MG-3, MG-4, MG-5), "add" a seventh Wartsila diesel generator (MG-17), "add" the new gyratory crusher that Cominco had already installed, and approve the addition of other equipment and changes necessary to support the production rate increase project.

28. On May 4, 1999, ADEC issued a preliminary PSD permit (preliminary draft PSD permit) for the production rate increase project for review and public comment. The preliminary draft PSD permit proposed to remove the operational cap of 109,660,000 kW-hr/year that applied to Wartsila diesel generators MG-1, MG-3, MG-4, and MG-5, to "add" the seventh Wartsila diesel generator (MG-17), to "add" the new gyrator crusher, and to approve the addition of other equipment and changes that Cominco requested in its PSD permit application for the production

rate increase project.

29. ADEC prepared a preliminary technical analysis report (Preliminary Technical Report) to accompany the preliminary draft PSD permit. The Preliminary Technical Report stated that the production rate increase project is expected to increase actual NOx emissions by up to 1,100 tons per year; carbon monoxide (CO) emissions by 90 tons per year; particulate matter (PM) emissions by 35 tons per year; PM emissions less than 10 micrometers in diameter (PM-10) by 35 tons per year; volatile organic compound (VOC) emissions by 59 tons per year; and lead (Pb) emissions by 0.046 tons per year. The proposed production rate increase project is expected to reduce sulfur dioxide (SO2) emissions by 37 tons per year.

30. In the preliminary draft PSD permit and Preliminary Technical Report, ADEC concluded that, of the seven Wartsila diesel generators, only MG-5 and MG-17 were subject to PSD requirements and therefore required BACT. EPA regulations require that technical and economic feasibility be considered when determining BACT. In the Preliminary Technical Report ADEC determined that Selective Catalytic Reduction (SCR) is a technically and economically feasible emission control technology for the Wartsila generators and that SCR could result in reductions of 712 tons per year of NOx for each Wartsila diesel generator. The Preliminary Technical Report also concluded that installation of low NOx controls would result in reductions of only 273 tons per year of NOx for each Wartsila diesel generator. The Preliminary Technical Report then concluded that BACT for MG-5 and MG-17 was an emission limit based on low NOx controls.

31. The Red Dog mine facility was at the time of construction and continues to be a

“major emitting facility” under Section 169(1) of the Act, 42 U.S.C. § 7479(1).

32. The Red Dog mine facility was at the time of construction and continues to be a facility with allowable emissions, as defined in 18 AAC 50.900(4), of at least 250 tons per year of a regulated air contaminant. The Red Dog mine facility is therefore a “facility,” as that term is defined in 18 AAC 50.300(a)(6).

33. The production rate increase project will “modify,” as that term is defined in 18 AAC 50.900(28), the Red Dog mine facility.

34. The production rate increase project will increase actual emissions of NO_x, PM, PM-10, and VOC from the Red Dog mine facility by more than the thresholds identified in 18 AAC 50.300(a)(6)(C) and will occur after 1980 and after the date of the most recent valid permit issued for the Red Dog mine under 18 AAC 50.400(c)(3). Therefore the Red Dog mine facility is a “facility,” as listed in 18 AAC 50.300(a)(6)(C).

35. The public comment period on the preliminary draft PSD permit for the production rate increase project ended on June 2, 1999.

36. On June 2, 1999, the United States Department of the Interior, National Park Service (NPS), submitted comments on the preliminary draft PSD permit for the production rate increase project. The NPS comments raised several concerns with the preliminary draft PSD permit, including the following:

- a. ADEC failed to subject four of the Wartsila diesel generators (MG-1 and MG-3 through MG-5) to PSD, including BACT. These generators are part of the production rate increase project because the preliminary draft PSD permit would remove an

operating restriction on these generators.

b. ADEC failed to require SCR on the two Wartsila diesel generators which ADEC acknowledged are subject to BACT (MG-5 and MG-17). SCR is BACT for the Wartsila diesel generators.

37. By letter dated July 29, 1999, EPA informed ADEC that it agreed with NPS's comments and had concluded that:

a. The Wartsila diesel generators MG-1 and MG-3 through MG-5 are subject to PSD, including BACT, because these generators are part of the production rate increase project since the preliminary draft PSD permit would remove the existing operating restriction on these generators.

b. Based on ADEC's preliminary Technical Report that accompanied the preliminary draft PSD permit, SCR is BACT for the Wartsila diesel generators MG-1, MG-3, MG-4, MG-5, and MG-17.

38. On September 3, 1999, ADEC provided to EPA a final draft permit No. 9932-AC005 for the Cominco Red Dog mine facility. The final draft permit was accompanied by a Final Technical Analysis Report (Final Technical Report) and Response to Comment document.

39. The Final Technical Report concluded that an emission rate achievable with low NOx controls to be BACT on Wartsila diesel generators MG-5 and MG-17. The final draft PSD permit included an emission rate limit of 121.3 lb/hour on MG-5 and MG-17 based on low NOx controls.

40. The final draft PSD permit did not require the installation of BACT on MG-1,

MG-3, and MG-4, but instead only proposed to reinstate the same limit on total annual emissions from MG-1, MG-3, and MG-4 which previously applied to total annual emissions from MG-1 through MG-5. This limit was listed in the final draft PSD permit as:

- (1) 2259 tons NOx/year from MG-1, MG-3, and MG-4; and
- (2) 750 ppm NOx corrected to 7% oxygen from each unit.

41. On September 15, 1999, EPA notified ADEC by letter that the final draft PSD permit was deficient and that issuance of the permit as proposed in the September 3, 1999, final draft PSD permit would not comply with the Clean Air Act or the Alaska SIP requirements relating to the construction or modification of new sources or modification of existing sources, if issued as drafted. Additional letters were sent to ADEC on September 28, 1999, and November 10, 1999, further explaining EPA's concerns with the final draft permit.

42. On December 10, 1999, pursuant to the authority of Sections 113(a)(5) and 167 of the Act, 42 U.S.C. §§ 7413(a)(5) and 7477, EPA issued a Finding of Noncompliance and Order, Docket No. CAA-10-99-0263, to ADEC (ADEC 113/167 Order). On the same day, the ADEC 113/167 Order was sent by fax and overnight certified mail return receipt requested to Michele Brown, ADEC Commissioner, and faxed to Tom Chapple, ADEC, Director, Division of Air and Water Quality. A copy of the ADEC 113/167 Order was faxed to Doug Horswill, Vice President for Environmental and Corporate Affairs, Cominco, and sent overnight certified mail return receipt requested to John Keys, General Manager, Cominco.

43. The ADEC 113/167 Order provides at paragraph 46a that:

The April 2, 1996, ADEC authorization of Cominco's construction and installation of new equipment, including the new gyratory crusher, at the Red Dog

mine facility prior to Cominco's receipt of a PSD permit allowing construction of such equipment did not comply with the requirements or prohibitions of the Clean Air Act and/or the Alaska SIP relating to the construction or modification of new sources or the modification of existing sources.

44. The ADEC 113/167 Order provides, in part, at paragraph 47 that "effective immediately upon issuance:

a. ADEC is prohibited from issuing a PSD permit to Cominco's Red Dog mine facility allowing the construction or modification of the facility and designating low NOx controls (or less effective controls) as BACT for Wartsila diesel generator MG-17, unless ADEC satisfactorily documents why SCR is not BACT for the Wartsila diesel generator at the Red Dog mine facility, or ADEC has demonstrated that the PSD permit is in compliance with the prevention of significant deterioration provisions of Part C of the Act, 42 U.S.C. §§ 7470-7492, and the Alaska SIP relating to the construction or modification of new sources or the modification of existing sources. In either case, ADEC must first obtain EPA's written concurrence on this determination.

....

c. In the event ADEC has already issued or released the permit, ADEC is ordered to retract or render it ineffective until such time as EPA provides written concurrence that the permit is in compliance with the prevention of significant deterioration provisions of Part C of the Act, 42 U.S.C. §§ 7470-7492, and the Alaska SIP relating to the construction or modification of new sources or the modification of existing sources.

45. Shortly after receiving the ADEC 113/167 Order, ADEC issued Air Quality Construction Permit No. 9932-AC005 for the Cominco Red Dog Mine on December 10, 1999 (final permit). The final permit was accompanied by a Final Technical Analysis Report dated December 10, 1999 (12/10/99 Technical Report).

46. The 12/10/99 Technical Report states at page 49 that "The Department [ADEC] finds an emission limit achievable with low NOx controls to be BACT on diesel generator MG-17. A vendor-guaranteed emission rate of 121.3 lb/hour is representative of the NOx reduction

expected of the Low NOx controls selected as BACT.”

47. Section 4, Best Available Control Technology (BACT) for Oxides of Nitrogen (NOx), Condition 20.1 of the final permit requires Wartsila diesel generator MG-17 to limit NOx emissions to no greater than 121.3 lb/hour averaged over any three hours.

48. On February 8, 2000, EPA notified ADEC pursuant to Section 113(a)(5) of the Act, 42 U.S.C. § 7413(a)(5) that Permit No. 9932-AC005, issued to Cominco on December 10, 1999, fails to comply with Part C of the Act, 42 U.S.C. § 7470-7492, the implementing regulations and Alaska SIP, and that the State is not in compliance with Part C of the Act.

49. The issuance of this Order, pursuant to Sections 113(a)(5) and 167 of the Act, 42 U.S.C. §§ 7413(a)(5) and 7477, is necessary to prevent any further construction or modification at the Red Dog mine facility.

V. ORDER

50. Based on investigation and analysis of relevant facts, and pursuant to Sections 113(a)(5) and 167 of the Act, 42 U.S.C. §§ 7413(a)(5) and 7477:

a. Cominco is prohibited from commencing any and all construction or modification activities at the Red Dog mine facility associated with the Wartsila diesel generator MG-17 until Cominco has demonstrated to EPA's satisfaction compliance with Part C of the Act and 40 C.F.R. Part 51, and obtains a valid PSD permit from ADEC for the Wartsila generator MG-17 that complies with the Act and with the December 10, 1999 Finding and Order.

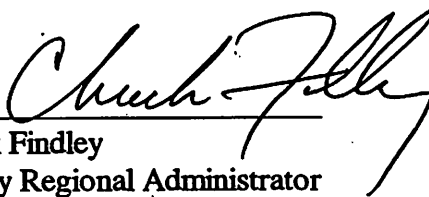
b. Cominco is specifically allowed to continue construction or operation of other portions of the Red Dog mine facility as authorized by ADEC Permit No. 9932-AC005.

c. Cominco shall submit, no later than five (5) days after the effective date of this Order, certification that Cominco has complied with the prohibition in the paragraph 50a above and will continue to comply with paragraph 50a of this Order until Cominco demonstrates to EPA's satisfaction compliance with Part C of the Act and 40 C.F.R. Part 51, Subpart I and the Alaska SIP. Such certification shall be submitted by certified mail with return receipt requested to:

Douglas E. Hardesty
Office of Air Quality
U.S. Environmental Protection Agency
1200 Sixth Ave, OAQ-107
Seattle, WA 98101

50. Cominco has the opportunity to confer with EPA concerning this Order. Any request for a conference should be made to Mr. Hardesty, Chief, Federal and Delegated Air Programs Unit, within 10 days of issuance of this Order. He may be reached at (206) 553-6641. Such a conference shall occur no later than March 16, 2000.

Issued this 8th day of Feb., 2000.


Chuck Findley
Deputy Regional Administrator

Certificate of Service

I certify that the forgoing Administrative Order was sent to the following persons, in the manner specified, on the date below:

Original by overnight, certified mail, return receipt requested:

Norman Mahoney
Registered Agent for
Cominco Alaska, Inc.
717 K Street
Anchorage, Alaska, 99501

Copy by overnight, certified mail, return receipt requested and Fax:

John Key
General Manager
Cominco Alaska Inc.
P.O. Box 1230
Kotzebue, Alaska 99752

Copy by overnight, certified mail, return receipt requested and Fax:

Michele Brown
Commissioner
Alaska Department of Environmental Conservation
410 Willoughby Avenue, Suite 105
Juneau, Alaska 99801-1795

Dated: FEB. 8, 2000

Valerie D. Badon
U.S. EPA Region 10

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
John Key, General Mgr.
Cominco Alaska Inc.
P. O. Box 1230
Kotzebue, AK. 99752

4a. Article Number
P 678 290 348

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
2/1/00

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X *R. Miller*

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Michele Brown, Commissioner
Ak. Dept. of Envir'l Conser.
410 Willoughby Ave., Ste. 105
Juneau, AK. 99801-1795

4a. Article Number
P 678 290 349

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
2/10/00

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X *M. Brown*

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Norman Mahoney, Reg. Agent for
Cominco Alaska, Inc.
717 K Street
Anchorage, AK. 99501

4a. Article Number
P 678 290 350

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
02-10-00

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X *N. Mahoney*

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

COM 3-018

P 678 290 348



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to John Keys, Gen. Mgr.	
Street & No. Cominco Alaska, Inc.	
P. O. Box 1230	
P.O., State & ZIP Code Kotzebue, AK. 99752	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date ORDER	

PS Form 3800, June 1990

COM 3-019

P 678 290 349



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Michele Brown, Commissioner	
Street & No. ADEN	
P.O., State & ZIP Code 410 Willoughby Ave. Ste. 105	
P.O., State & ZIP Code Juneau, AK. 99801-1795	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date ORDER	

PS Form 3800, June 1990

P 678 290 350



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Norman Mahoney, Reg. Agent	
Street & No. Cominco Alaska, Inc.	
P.O., State & ZIP Code 717 K Street	
P.O., State & ZIP Code Anchorage, AK. 99501	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date ORDER	

PS Form 3800, June 1990